

From: ["Gravatt, Dan" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE:GROUP \(FYDIBOHF23SPDLT\)/CN=RECIPIENTS/CN=AA541C35E726461A8D36825C87A211A2-GRAVATT.DAN>](#)  
To: [Field](#)  
[Jeff](#)  
CC:  
Date: 7/10/2014 7:35:14 AM  
Subject: State comments on MEW five year review, FW: MEW  
Attachments: [July 9.docx](#)

Take a look and then we can discuss how to respond.

Daniel R. Gravatt, PG  
US EPA Region 7 SUPR/MOKS  
11201 Renner Boulevard, Lenexa, KS 66219  
Phone (913) 551-7324

Principles and integrity are expensive, but they are among the very few things worth having.

**From:** Van Dyke, Don [mailto:Don.VanDyke@dnr.mo.gov]  
**Sent:** Wednesday, July 09, 2014 11:59 AM  
**To:** Gravatt, Dan  
**Subject:** RE: MEW

Dan,

Draft is attached, hard copy to follow.

**From:** Gravatt, Dan [<mailto:Gravatt.Dan@epa.gov>]  
**Sent:** Wednesday, July 09, 2014 7:19 A M  
**To:** Van Dyke, Don  
**Subject:** RE: MEW

Any progress on this?

Daniel R. Gravatt, PG  
US EPA Region 7 SUPR/MOKS  
11201 Renner Boulevard, Lenexa, KS 66219  
Phone (913) 551-7324

Principles and integrity are expensive, but they are among the very few things worth having.

**From:** Van Dyke, Don [<mailto:Don.VanDyke@dnr.mo.gov>]  
**Sent:** Thursday, July 03, 2014 7:57 AM  
**To:** Gravatt, Dan  
**Subject:** MEW

Comments should be forth-coming hopefully today. Mgt hasn't commented yet.

Donald Van Dyke  
Superfund Section  
Missouri Department of Natural Resources

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July 9, 2014

Daniel R. Gravatt, PG  
US EPA Region 7 SUPR/MOKS  
11201 Renner Blvd., Lenexa, KS 66219

Dear Mr. Gravatt:

I have reviewed the Third-Five Year Review Report (Review) for the Missouri Electric Works Site (MEWS) in Cape Girardeau, Cape Girardeau County, Missouri. I have some major concerns on the behalf of the State of Missouri.

I agree with the conclusion, based on the data collected by EPA's contractor that further characterization of residual on-site contamination warrants investigation. The levels of Polychlorinated Biphenyl (PCB) contamination detected on-site and in the ravine area pose serious question as to the protectiveness of the remedy.

The data collected by EPA's contractor clearly indicate there is potential risk to any future development in alluvial bottoms area, specifically exposure to contamination that may have resulted from alluvium prior to the placement of fill in the bottom area. This investigation needs to be initiated immediately.

Fish tissue data collected for the Review in the alluvial bottom pond indicated a level of PCB contamination in excess of safe levels for human consumption. (Reference 6/19/2014 @ 9:15 am e-mail from Dennis Wambuguh). Although fencing is in place, this issue needs immediate attention of the Missouri Electric Works Steering Committee (MEWSC). The investigation must address the pond and any potential exposures in the stream both upstream and downstream of the ponded area.

I feel that the volatile organic contamination in the groundwater at MW-16 A, B and C is a concern. However, the continued decrease in the levels is reassuring that natural attenuation may alleviate this issue.

The remaining groundwater contaminants emanating from the MEWS into the alluvial bottom need further investigation. The potential for migration through fracture flow has not been fully characterized.

The implementation of institutional controls (ICs) at the site is the responsibility of the MEWSC as part of the Remedial Action/Remedial Design. Enforcement of the ICs will be the responsibility of the City or State.

In conclusion, the delays in the investigation and remediation at the MEWS need resolution. The potential risks are clearly indicated by the data collected during the Review. The State requests the negotiations with the MEWSC be resolved in a timely manner so potential risks at the MEWS and the associated alluvial bottoms area are addressed.

Sincerely,

HAZARDOUS WASTE PROGRAM

Donald F. Van Dyke  
Project Manager